

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

This document applies to:

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

ETHICON WAVE 9 CASE LISTED IN
PLAINTIFFS' EXHIBIT A (Doc. 8269)¹

**ETHICON DEFENDANTS' NOTICE OF ADOPTION OF WAVE 3 *DAUBERT*
RESPONSE REGARDING NICOLETTE SIGRID HORBACH, M.D., FOR WAVE 9**

Plaintiffs filed a Notice of Adoption as to the opinion testimony of Nicolette Sigrid Horbach, M.D., in the Wave 9 case identified in Exhibit A to their Notice. *See* Doc. 8269. In response, Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general causation opinions of Nicolette Horbach, M.D. for Ethicon Wave 3 (Dkt. 2907) as their response for Wave 9. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 3 response briefing.

Respectfully submitted,

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¹ Plaintiffs' Exhibit A identifies two cases: *Kathleen Lindon* (2:16-cv-7814) and *Brenda J. Miller* (2:15-cv-11924). The *Lindon* case was terminated by the Court on May 9, 2019.

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CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
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